

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No. 1:20-CR-143
v.)	
)	Honorable T.S. Ellis, III
ZACKARY ELLIS SANDERS,)	
)	Trial: October 19, 2021
<i>Defendant.</i>)	
_____)	

GOVERNMENT’S SUPPLEMENTAL RULE 16(A)(1)(G) NOTICE

The United States, by and through undersigned counsel, notices its intent under Federal Rule of Criminal Procedure 16(a)(1)(G) to introduce expert testimony in the defendant’s trial, which is scheduled to commence on October 19, 2021, and states as follows:

The United States may call as an expert witness at trial Dr. Paul Montalbano, Ph.D. ABPP (Forensic) during its case-in-chief at trial. If called, this witness will testify as an expert witness about his forensic evaluation of the defendant and the results of that forensic evaluation. A detailed written summary of his anticipated testimony has been provided to the defense and the Court in the form of his forensic evaluation report, which explains his opinions regarding his forensic evaluation of the defendant and the bases and reasons for those opinions. Dkt. No. 447. Given the nature of the information discussed by Dr. Montalbano, this report has been filed under seal. A copy of Dr. Montalbano’s *curriculum vitae*, which outlines his qualifications as an expert witness, has likewise been provided to the defendant and the Court. Dkt. No. 465-1.

The United States has moved to exclude all evidence related to Dr. Montalbano’s anticipated testimony—as well as all evidence related to any similar testimony provided by the

defendant's proposed expert witnesses—but nevertheless files this expert notice out of an abundance of caution while that motion remains pending. *See, e.g.*, Dkt. Nos. 371 and 459.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

Date: October 5, 2021

By: /s/
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